1	JAMES L. DAY (WSBA #20474)	HONORABLE CHRISTOPHER M. ALSTON
2	RICHARD B. KEETON (WSBA #5153 BUSH KORNFELD LLP	37)
3	601 UNION STREET, SUITE 5000 SEATTLE, WA 98101	
4	Tel: (206) 292-2110 Emails: jday@bskd.com, rkeeton@bskd	d.com
5		
6		TATES BANKRUPTCY COURT I DISTRICT OF WASHINGTON
7	In re	Chapter 11
8	B-1208 PINE, LLC,	Case No. 24-10088-CMA
9	Debtor.	OBJECTION TO CLAIM NO. 3 OF
10		CHRISTINE LEE AND OMAR LEE, NOTICE OF HEARING AND
11		CERTIFICATE OF MAILING
12		NE LEE AND OMAR LEE CRK OF THE COURT
13	AND TO: THE HON	NORABLE CHRISTOPHER M. ALSTON OAY, DECEMBER 26, 2024
14	HEARING DATE: THURSD	AY, JANUARY 2, 2025 . PACIFIC TIME
15	LOCATION: Seattle Fe	ederal Courthouse
16	700 Stewa	m 7206, 7th Floor art Street Vashington 98101
17	NOTICE IS HEREBY GIVEN	N that the undersigned has filed an Objection to your claim in
18	the above-captioned Chapter 11 bankrup	
19		Your claim may be reduced, modified, or eliminated. You d discuss them with your attorney, if you have one.
20		
21	modify or eliminate your claim, then	NOTICE THAT if you do not want the Court to reduce, you or your attorney must file with the Court on or before
22	response is mailed to the Court for filin	g, you must mail it early enough so that the Court will receive
23	it on or before the date stated above; ma	ii to the following address:

OBJECTION TO CLAIM NO. 3 OF CHRISTINE LEE AND OMAR LEE, NOTICE OF HEARING AND CERTIFICATE OF MAILING – Page 1

1 **U.S. Bankruptcy Court** Western District of Washington 700 Stewart Street, Suite 6301 2 **Seattle, WA 98101** 3 You must also mail a copy to the undersigned attorney at the address provided above. 4 PLEASE TAKE FURTHER NOTICE that a hearing to consider this Objection and allowance of your claim shall be held on Thursday, January 2, 2025, at 9:30 a.m. Pacific Time (the 5 "Hearing") in the United States Bankruptcy Court, located at the Seattle Federal Courthouse, 700 Stewart Street, Courtroom 7206, 7th Floor, Seattle, Washington. 6 **IF YOU OPPOSE** the Objection, you must file your written response with the court clerk and 7 serve it upon the undersigned counsel NOT LATER THAN THE RESPONSE DATE, which is Thursday, December 26, 2024. 8 IF NO RESPONSE IS TIMELY FILED AND SERVED, the Court may, in its discretion, 9 SUSTAIN THE OBJECTION PRIOR TO THE HEARING, WITHOUT FURTHER NOTICE TO YOU, and strike the Hearing. 10 B-1208 Pine, LLC, debtor in possession in the above-captioned chapter 11 bankruptcy case, 11 objects to the above-named creditor/claimant's claim upon the grounds indicated below: 12 13 **OBJECTION TO CLAIM** B-1208 Pine, LLC (the "Debtor"), debtor and debtor in possession in the above-captioned 14 chapter 11 bankruptcy case (the "Chapter 11 Case"), hereby objects to the asserted claim of Christine 15 Lee and Omar Lee ("Claimants") for the reasons set forth below: 16 1. On January 16, 2024 (the "Petition Date"), the Debtor filed a voluntary petition for 17 relief under chapter 11 of the Bankruptcy Code before this Court. 18 2. Throughout the pendency of this Chapter 11 Case, the Debtor operated and managed 19 its business as a debtor in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code. 20 3. Pursuant to Federal Rule of Bankruptcy Procedure 3003(c)(3) and the Court's Order 21 22 Setting Claims Bar Date [Docket No. 76], the deadline for non-governmental entities to file a proof of claim in this Chapter 11 Case was April 25, 2024 (the "Claims Bar Date"). 23

OBJECTION TO CLAIM NO. 3 OF CHRISTINE LEE AND OMAR LEE, NOTICE OF HEARING AND CERTIFICATE OF MAILING – Page 2

- 4. Prior to the Claims Bar Date, on March 15, 2024, Claimants filed Proof of Claim No. 3 (the "Proof of Claim," and the asserted claim evidenced thereby, the "Claim") with the Court in the Chapter 11 Case. See Proof of Claim No. 3.
- 5. Claimants assert they hold an unsecured claim against the Debtor in the amount of \$4,000,000 (the "Claim Amount") arising from a "promissory note, loan agreement and recorded deed of trust" (collectively, the "Loan Documents"), all of which are attached to the Proof of Claim. *Id.*
- 6. The Debtor objects to Claim No. 3 of Claimants Christine Lee and Omar Lee on the basis that the Proof of Claim and Loan Documents fail to evidence any claim against the Debtor but, rather, purport to evidence a claim against third party non-debtor Pine Esker, LLC ("Pine Esker"). Pine Esker is not a debtor in this Chapter 11 Case. See Fed. R. Bankr. P. 3001(c). Absent submission of any supporting documentation evidencing a claim against the Debtor, the Claim should be disallowed in its entirety.
- 7. This Objection is limited to the grounds stated herein. The Debtor expressly reserves all further substantive or procedural objections. Nothing contained herein or any actions taken pursuant to such relief is intended or should be construed as: (a) an admission as to the validity of any claim against the Debtor; (b) a waiver of the Debtor's right to dispute any claim on any grounds; (c) a promise or requirement to pay any claim; (d) an implication or admission that any particular claim is of a type specified in this Objection; or (e) a waiver of the Debtor's rights under the Bankruptcy Code or any other applicable law.

IF YOU OR YOUR ATTORNEY DO NOT TAKE THE STEPS SET FORTH ABOVE, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE OBJECTION TO YOUR CLAIM.

22

23

1	DATED this 26 th day of November, 2024.
2	BUSH KORNFELD LLP
3	By /s/ Richard B. Keeton
4	James L. Day, WSBA #20474 Richard B. Keeton, WSBA #51537
5	Attorneys for the Debtor
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	

OBJECTION TO CLAIM NO. 3 OF CHRISTINE LEE AND OMAR LEE, NOTICE OF HEARING AND CERTIFICATE OF MAILING – Page $4\,$

1	CERTIFICATE OF MAILING
2	I certify that on this 26 th day of November, 2024, at Seattle, Washington, I caused copies of the
3	Objection to Claim No. 3 of Christine Lee and Omar Lee, Notice of Hearing and Certificate of
4	Mailing to be mailed by U.S. First Class Mail, postage pre-paid to:
5	Christine Lee and Omar Lee
6	18230 E. Valley Hwy., #195 Kent, WA 98032-1823
7	and emailed to: christine.greatwallmall@gmail.com .
8	I declare under penalty of perjury that the foregoing is true and correct.
9	/s/ Eric Yocom
10	Eric Yocom
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	

OBJECTION TO CLAIM NO. 3 OF CHRISTINE LEE AND OMAR LEE, NOTICE OF HEARING AND CERTIFICATE OF MAILING – Page 5